

## **REMARKS/ARGUMENTS**

Claims 1-11 are pending in this application.

Claim 7 has been amended for clarity.

Claims 1-11 had been rejected under 35 U.S.C. §103(a) over Fogg (US Patent 6,466,624 B1) in view of Nybo et al. (US Patent Application Publication US 2001/0052933 A1). This rejection is respectfully traversed for the following reasons.

Claims 1-11 comprise as elements: determining a respective displacement vector field from a comparison of two successive optically acquired images; identifying a trajectory for each pixel of the optically acquired images from the displacement vector fields; and applying an operation to the images optically acquired by the detector unit along the trajectory.

Nybo teaches capturing video with a video camera and converting video into the MPEG format.

Fogg describes image-enhancement methods for an MPEG stream input.

Fogg cannot be modified to operate on original captured images. Fogg uses the information embedded in the MPEG stream for image enhancement, and Fogg would not be operable if, instead of an MPEG stream, the original captured images were provided on the Fogg's input. See, for example, col. 12, line 63, – col. 13, line 3 of Fogg, cited by the Examiner in the pending Office Action, page 5.

Therefore, Fogg teaches away from the present invention by relying on the input being different from the original captured images, and Claims 1-11 would not read on Fogg modified by Nybo.

Modifying Fogg by Nybo only adds to the Fogg's MPEG processor a camera producing MPEG video. This combination does not allow implementing any of the aforementioned elements operating on optically acquired images in Claims 1-11 because

the Fogg component cannot be modified to operate on originally acquired images and Nybo component only captures video and converts it into MPEG.

As explained hereinabove, the aforementioned elements of Claims 1-11 are not taught or suggested in Fogg, Nybo, or their combination. Therefore, Claims 1-11 are patentable and nonobvious over Fogg and Nybo under 35 U.S.C. §103(a) and should be allowed.

It is believed that the present application is in condition for allowance. A Notice of Allowance is respectfully solicited in this case. Should any questions arise, the Examiner is encouraged to contact the undersigned.

Respectfully submitted,

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